



U.S. Department of Justice

United States Attorney  
Southern District of New York

USDC SDNY

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The Jacob K. Javits Federal Courthouse  
26 Federal Plaza, 37th Floor  
New York, New York 10278

January 28, 2025

**BY ECF**The Honorable Analisa Torres  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007**Re: *United States v. Timothy Shea*, S2 20 Cr. 412 (AT)**

Dear Judge Torres:

The Government respectfully submits this letter in connection with defendant Timothy Shea's motion for a reduction in sentence pursuant to 18 U.S.C. § 3582(c)(1) (the "Motion"). (Dkt. 435). For the reasons set forth below, the Government requests that the Court provide the Government until February 13, 2025, to respond to the defendant's motion—that is, two additional weeks from the current deadline of January 30, 2025.

On November 27, 2024, the Court directed the defendant to provide certain supplemental evidence by December 30, 2024. (Dkt. 440 at 3). Those materials were timely submitted through the mail on December 30, 2024, but did not arrive to the Court until January 10, 2025, at which time they appear to have been filed under seal and no electronic or other notification was provided to the Government. On January 26, 2025, the Government became aware that the defendant submitted supplemental evidence and the Court promptly provided a copy of those materials to the Government.

The Court's order of November 27, 2024 provided the Government with 30 days to respond to the defendant's motion after the submission of the supplemental evidence. (Dkt. 440 at 3). Given that the Government did not receive those materials until Sunday, January 26, 2025—that is, four days before the current deadline of January 30, 2025—the Government requests permission to file its response by February 13, 2025, in order to allow the Government to fully and carefully consider the supplemental evidence, take steps to gather additional information that may be

relevant to the Court's consideration, formulate its position, and draft and submit a response that will be of assistance to the Court's resolution of the Motion.

Respectfully submitted,

DANIELLE R. SASSOON  
United States Attorney

By: s/  
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Assistant United States Attorneys  
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cc: Timothy Shea (by U.S. mail)

GRANTED. The Clerk of Court is respectfully directed to mail a copy of this order to Defendant *pro se*.

SO ORDERED.

Dated: January 29, 2025  
New York, New York

  
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ANALISA TORRES  
United States District Judge